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Ser 1811JC/00534

20 NOV 1990

Mr. Chuck Flippo  
Remedial Project Manager,  
Hunters Point Annex (H-7-5)  
U.S. Environmental Protection Agency, Region 9  
Hazardous Waste Management Division  
75 Hawthorne Street  
San Francisco, CA 94105

Dear Mr. Flippo:

In accordance with the Federal Facility Agreement for Naval Station, Treasure Island, Hunters Point Annex (HPA), and your phone conversation with Ms. Julie Carver of the U.S. Navy, and Ms. Susan Schrader and Ms. Peggy Llewellyn of Harding Lawson Associates of November 6, 1990, this letter and its attachments serve as the Navy's response to the U.S. Environmental Protection Agency's comments dated October 11, 1990 for the Draft Final Removal Action Work Plan for Tank S-505.

The attached Addendum to the Draft Final Removal Action Work Plan for Tank S-505 should simply be inserted into the existing Draft Final document dated August 28, 1990. This response, in conjunction with the existing work plan and the Asbestos Abatement Work Plan Addendum when approved, will constitute the Final Removal Action Work Plan (Phase I) for Tank S-505 at HPA. A copy of this letter should be inserted after the title page of the work plan to document the revisions.

Should you have any questions regarding this matter, the point of contact is Commander, Western Division, Naval Facilities Engineering Command (Attn: Julie A. Carver, Code 1811JC, (415) 244-2557).

Sincerely,

Original signed by:

MICHAEL A. MIGUEL  
Head, Environmental Restoration Branch

Attachment: Addendum to Draft Final Removal Action Work Plan for Tank S-505

Copy to:

Regional Water Quality Control Board (Attn: Steve Ritchie)  
Bay Area Air Quality Management District (Attn: Scott Lutz)  
Department of Health Services (Attn: Mark Malinowski)  
California Dept. of Fish & Game (Attn: Mike Rugg)  
U.S. Fish & Wildlife Service (Attn: Steve Schwarzback)  
National Oceanic & Atmospheric Administration (Attn: Chip Demarest)  
Hunters Point Technical Review Committee Public Member (Attn: Rev. Arelious Walker)  
City and County of San Francisco (Attn: David Wells)  
San Francisco District Attorney (Attn: Steve Castleman)

Blind copy to: 09C9, 202, 09A2A.20, 09B  
181, 1811, 1811RP, 1811JC, 1811RC,  
Admin. Record, Harding  
COMNAVBASE S.F.  
PWC S.F. BAY (Code 420)  
NAVSTA Treasure Island  
Lawson Associates (Attn: Mary Lucas),  
OIC Treasure Island, HPA, PRC (Attn: Gary Welshans)  
COMNAVSEASYSKOM (Attn: Robert Milner)

Writer: J. Carver, 1811JC, x2557  
Typist: B. Palmer, 16 Nov 90, Dft Final Rem. Act S505  
File: HP/DOHS

DRAFT FINAL  
REMOVAL ACTION FOR TANK S-505,  
VOLUME 1 – WORK PLAN

DATED 28 AUGUST 1990

IS ENTERED IN THE DATABASE AND FILED AT  
ADMINISTRATIVE RECORD NO. N00217.001420

DRAFT ADDENDUM TO  
REMOVAL ACTION FOR TANK S-505,  
VOLUME 1 – WORK PLAN,  
ASBESTOS ABATEMENT WORK PLAN

DATED 08 OCTOBER 1990

IS ENTERED IN THE DATABASE AND FILED AT  
ADMINISTRATIVE RECORD NO. N00217.001512

DRAFT FINAL ADDENDUM TO  
REMOVAL ACTION FOR TANK S-505,  
VOLUME 1 – WORK PLAN,  
ASBESTOS ABATEMENT WORK PLAN

DATED 19 DECEMBER 1990

IS ENTERED IN THE DATABASE AND FILED AT  
ADMINISTRATIVE RECORD NO. N00217.001770

**ADDENDUM TO DRAFT FINAL  
REMOVAL ACTION WORK PLAN FOR TANK S-505  
HUNTERS POINT ANNEX  
RESPONSE TO EPA COMMENTS  
DATED OCTOBER 11, 1990**

Comment 1:

Page 29, Section 4.3. Reference is made in the first sentence to decontaminating the tank by double rinsing. Please note that 40 CFR 761.79 requires triple flushing. EPA wishes to note, however, that there may be alternatives to solvent flushing which may be environmentally beneficial, especially given the large amount of solvent needed to adequately flush Tank S-505. A list of firms permitted to conduct alternative methods of decontamination is available from Joe Karkoski of EPA's Air and Toxics Division, at (415) 556-8960.

Response: The plans and specifications which will comprise Volume II of the removal action work plan for Tank S-505 will include triple rinsing as required by 40 CFR 761.79. At least one of the rinses will be a solvent/water rinse with concurrent physical wiping using brushes, mops, or similar cleaning tools.

The use of an alternative solvent to kerosene for decontamination of Tank S-505 was evaluated. Discussions with contractors experienced in PCB decontamination resulted in the selection of Penetone Power Cleaner 155. A material safety data sheet (MSDS) and manufacturer's information is attached for EPA review. The Penetone is a nonflammable cleaner expected to be safer to manage at the work site than kerosene. The spent Penetone/water mixture will be disposed of with other PCB liquids from the site by incineration at an EPA-permitted disposal facility. The use of Penetone Power Cleaner 155 will be written into the plans and specifications for the removal action for Tank S-505.

Comment 2:

Page 33, Section 4.6.1. Since the concentration of PCBs in the tank contents is still an open question, we feel it is crucial to complete a statistically valid sampling program before decisions concerning removal of tank contents, decontamination of the tanks, and disposal of wastes are made. We believe a sampling and analysis plan should be included in the workplan which will address the minimum number of samples to be taken, QA/QC procedures, and the statistical approach to determining PCB concentrations.

In addition to the need to confirm the PCB levels in the tank contents, we remain concerned that the tests run to date on the contents of the tank do not constitute a hazardous waste determination under 40 CFR Part 262. The tank contents may be hazardous for contaminants other than PCBs. Certain of the metals found in the sludge, as report in Table B-2, such as lead and total chrome, are high enough to warrant running the TCLP to determine whether

the waste is a characteristic hazardous waste under the Toxicity Characteristic, or TC, rule (40 CFR Part 261.24). In addition to metals, the recent TC rule covers a number of organic constituents not previously covered by the EP Tox rule (which has been replaced by the TC rule).

Although the treatment or disposal facility which is to receive the waste may have their own analytical requirements, 40 CFR Part 261 places on the generator the responsibility for determining whether his or her waste is hazardous. Therefore, we believe the Navy is obligated to test the tank contents for the hazardous waste characteristics under 40 CFR Part 261 Subpart C prior to arranging for its treatment of disposal.

Response: Based on the analytical results on the contents of Tank S-505, the anticipated concentration of the liquid is between 50 ppm and 200 ppm after bulk mixing during transfer to the transport vehicle. Volume II of the workplan will describe the tests to be conducted by the Navy on bulk liquids before they are taken to the disposal site for incineration. Tests will include:

<u>Test Method</u>	<u>Constituent(s)</u>
California Waste Extraction Test	WET extraction
EPA Method 1311	TCLP extraction
EPA Method 6010	antimony
(ICAP)	barium
	beryllium
	cadmium
	chromium
	cobalt
	copper
	lead
	molybdenum
	nickel
	silver
	vanadium
	zinc
EPA Method 7060	arsenic
EPA Method 7470	mercury
EPA Method 7740	selenium
EPA Method 7840	thallium
EPA Method 8240	volatile organics
EPA Method 8270	semivolatile organics
EPA Method 8080	PCBs

Additional tests may be required by the incineration facility operators before the materials are accepted for disposal.

**Comment 3:**

Page 35, Section 4.7.2. Unless the soil removed from the berm, as well as soil removed from pipe excavation, is confirmed by analysis to be non-hazardous, it should not be removed from the Area of Contamination for storage in a waste pile as proposed. To do so would trigger Land Disposal Requirements under 40 CFR Part 268. An alternative would be storage in containers, such as roll-off bins.

**Response:** The soil removed from the berm to gain access to Tank S-505 will be placed in covered roll-off bins lined with synthetic material. The soil will be tested for the same constituents as the bulk liquids (see Response to Comment 2). Bin storage of soils will be specified in Volume II of the workplan.

**Comment 4:**

Appendix A, page 5. We remain concerned about disturbance of surface soils containing PCBs or other potential contaminants. Neither the revised workplan nor the response to our comment resolved this concern. The detailed design and construction specifications submitted as Volume II of the workplan should address how the contractor will avoid disturbing stained areas of soil within or around the bermed area so as to minimize release of contaminants to the air.

**Response:** The specifications that comprise Volume II of the removal action work plan for Tank S-505 will include provisions for dust control. A minimum quantity of water sprayed on dry soil will control airborne contaminants. Additionally, personnel and equipment decontamination procedures will be addressed in the specifications.

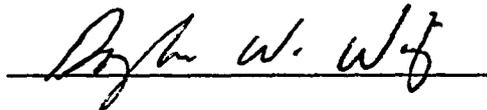
DISTRIBUTION  
ADDENDUM TO REMOVAL ACTION WORK PLAN  
TANK S-505  
HUNTERS POINT ANNEX  
SAN FRANCISCO, CALIFORNIA  
RESPONSE TO EPA COMMENTS DATED OCTOBER 11, 1990  
November 15, 1990

Copy No. 4

		<u>Copy No.</u>
29 copies:	United States Navy Western Division Naval Facilities Engineering 900 Commodore Drive, Building 101 San Bruno, California 94066-0720  Attention: Ms. Louise Lew, Code 1811 LL	1 -29
1 copy:	Aqua Terra Technologies	30
1 copy:	File Copy	31
1 copy:	Qc/Bound Report	32
3 copies:	Harding Lawson Associates	33 - 35

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QUALITY CONTROL REVIEWER



Douglas W. Wing  
Associate Engineer